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Exhibits: None

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE



Case No. 15-CV-00280-PB

- - - - - x

JONATHAN LEITE,

Plaintiff,

v.

MATTHEW GOULET, et al.,

Defendants.

- - - - - x

DEPOSITION OF YVON POULIN

September 20, 2017

11:12 a.m. to 11:30 a.m.

NORTHERN NH CORRECTIONAL FACILITY

138 East Milan Road

Berlin, New Hampshire

Reporter: Celeste A. Quimby, LCR No. 17

<p>1 I N D E X</p> <p>2</p> <p>3 WITNESS: Yvon Poulin</p> <p>4</p> <p>5 EXAMINATION: Page 4</p> <p>6 By Mr. King 4</p> <p>7</p> <p>8</p> <p>9</p> <p>10 EXHIBITS FOR IDENTIFICATION:</p> <p>11 None.</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>	<p>Page 2</p> <p>Page 4</p> <p>1 YVON POULIN</p> <p>2 having been duly sworn by the reporter,</p> <p>3 was deposed and testified as follows:</p> <p>4 EXAMINATION</p> <p>5 BY MR. KING:</p> <p>6 Q. Please state your name for the record.</p> <p>7 A. Yvon Poulin.</p> <p>8 Q. Could you spell that for the court</p> <p>9 reporter?</p> <p>10 A. Yes. Y-v-o-n, P-o-u-l-i-n.</p> <p>11 Q. You are employed here at the Northern New</p> <p>12 Hampshire Correctional Facility?</p> <p>13 A. Yes.</p> <p>14 Q. How long have you been employed here?</p> <p>15 A. I'm on my 18th year.</p> <p>16 Q. So since 1999?</p> <p>17 A. Yeah, when they opened.</p> <p>18 Q. What is your current title?</p> <p>19 A. Electronics technician/locksmith.</p> <p>20 Q. What was your title on August 24, 2012?</p> <p>21 A. Same thing.</p> <p>22 Q. For how long have you held the title of</p> <p>23 electronics technician/locksmith?</p>
<p>Page 3</p> <p>1 A P P E A R A N C E S</p> <p>2 For the Plaintiff:</p> <p>3 DOUGLAS, LEONARD &amp; GARVEY, P.C.</p> <p>4 By: Benjamin T. King, Esq.</p> <p>5 Megan E. Douglass, Esq.</p> <p>6 14 South Street, Suite 5</p> <p>7 Concord, NH 03301</p> <p>8 (603) 224-1988</p> <p>9 benjamin@nhlawoffice.com</p> <p>10 mdouglass@nhlawoffice.com</p> <p>11</p> <p>12 For the Defendants:</p> <p>13 NEW HAMPSHIRE DEPARTMENT OF JUSTICE</p> <p>14 OFFICE OF THE ATTORNEY GENERAL</p> <p>15 By: Lynmarie C. Cusack, Esq.</p> <p>16 Francis K. Fredericks Jr., Esq.</p> <p>17 33 Capitol Street</p> <p>18 Concord, NH 03301</p> <p>19 (603) 271-3658</p> <p>20 lynmarie.cusack@doj.nh.gov</p> <p>21 francis.fredericksjr@doj.nh.gov</p> <p>22</p> <p>23</p> <p>STIPULATIONS</p> <p>It is agreed that the deposition shall be taken in the first instance in stenotype and when transcribed may be used for all purposes for which depositions are competent under the Federal Rules of Civil Procedure.</p> <p>Notice, filing, caption, and all other formalities are waived. All objections except as to form are reserved until the time of trial.</p> <p>It is further agreed that if the deposition is not signed within thirty (30) days after submission to counsel, the signature of the deponent is waived.</p>	<p>Page 5</p> <p>1 A. 18 years, since day one.</p> <p>2 Q. Have your job responsibilities changed</p> <p>3 in any respect over the course of your career?</p> <p>4 A. Pretty much the same thing.</p> <p>5 Q. Tell me as of August 24th, 2012, what</p> <p>6 your daily job responsibilities entailed as an</p> <p>7 electronics technician.</p> <p>8 A. Everything in the facility or just video?</p> <p>9 Q. Fair enough. Tell me what your job</p> <p>10 responsibilities entailed with respect to video</p> <p>11 monitoring of inmates.</p> <p>12 A. All I do is I make sure everything runs.</p> <p>13 I install it, program it, make sure it works. I</p> <p>14 check it on a daily basis.</p> <p>15 Q. Do you play any role in preserving video</p> <p>16 footage?</p> <p>17 A. No. It does that. Only if the machine</p> <p>18 goes down, that's the only thing I do, repair it.</p> <p>19 Q. Back in August of 2012, what happened to</p> <p>20 video footage after it was taken?</p> <p>21 A. I don't know what they did with it. I'm</p> <p>22 not charged with what's recorded or downloaded.</p> <p>23 Q. Back in August of 2012, who was in charge</p>

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1 of what was recorded or downloaded?

2 **A. I think Investigations takes care of**

3 **that.**

4 Q. Okay. Would you ever receive

5 instructions from personnel in Investigations or

6 someone such as a shift commander to preserve

7 certain video footage?

8 **A. No. They usually know how to do it. I**

9 **teach them right at the beginning and whoever does**

10 **it from there.**

11 Q. Okay. I'm going to represent to you that

12 we have an incident report from a shift commander

13 on duty on August 24th, 2012, where the shift

14 commander writes that he reviewed video evidence

15 of Jonathan Leite leaning over his bunk and

16 vomiting onto the floor. I will further represent

17 to you that that video footage described in the

18 incident report has not been produced and is

19 apparently lost. How would that happen?

20 **A. On my end, I have no idea.**

21 **MR. FREDERICKS:** Objection. Go ahead.

22 **A. On my end, I have no idea. The video --**

23 **the DVR didn't lose it, because nothing would be**

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1 **erased. The only thing I can do to a DVR is wipe**

2 **out the hard drive.**

3 Q. All right. Would you be able at this

4 point in time to recapture and produce all the

5 video footage of activities on F block on August

6 24th, 2012?

7 **A. On -- my DVRs can't go back that far.**

8 **They got about 15 days or so.**

9 Q. Back in 2012 was that the case, a

10 15-day --

11 **A. Approximate, yeah.**

12 Q. -- life?

13 **A. And it's always different because it's**

14 **all motion controlled, motion sensors. So you**

15 **always get a day or two difference.**

16 **MR. FREDERICKS:** Let him finish the full

17 question.

18 **THE WITNESS:** Um-hum.

19 **MR. FREDERICKS:** Just for the record to

20 be clear.

21 Q. BY MR. KING: Okay. Back in August and

22 September of 2012, if video footage of F block

23 were not downloaded within approximately 15 days

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1 of August 24th, 2012, what would have happened to

2 the video footage?

3 **A. It gets rewritten over with new video.**

4 Q. So it's lost?

5 **A. Lost, yup.**

6 Q. Back in August or September of 2012, did

7 anyone here at the Northern New Hampshire

8 Correctional Facility communicate with you

9 regarding preserving video footage of F block

10 taken on August 24th, 2012?

11 **A. I don't recall anything like that**

12 **happening.**

13 Q. Back in August and September of 2012, who

14 had access to the video footage taken of F block

15 on August 24th, 2012, within the 15-day period

16 following August 24th, 2012?

17 **A. I honestly don't know who they bring in**

18 **there with them, who gets the key. I'm not sure**

19 **how that works.**

20 Q. Okay. Back in August and September of

21 2012, did persons employed as shift commanders

22 here at the correctional facility know that video

23 footage would be lost if it were not downloaded

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1 within 15 days?

2 **MR. FREDERICKS:** Objection to form. Go

3 ahead.

4 **A. Well, some do. Some don't. I'm not sure**

5 **a hundred percent who knows and who doesn't know.**

6 Q. Certainly. Do you know who Jeffrey Smith

7 is?

8 **A. Yes.**

9 Q. And back on August 24th, 2012, Jeffrey

10 Smith was employed as a sergeant here, right?

11 **A. I'm -- I think, yeah. I don't know if he**

12 **was a sergeant, but I know he was...**

13 Q. Do you know whether Sergeant Smith on

14 August 24th, 2012, would have known that if he did

15 not download video footage of an incident within

16 15 days of that incident occurring, that the video

17 footage would be lost?

18 **A. I have no idea if he knew or not.**

19 Q. On August 24th, 2012, or at any time

20 preceding that, did you communicate with Northern

21 New Hampshire Correctional Facility personnel that

22 video footage would be lost if it were not

23 downloaded within 15 days?

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1 A. No, I didn't tell -- didn't publicize  
2 that at all.  
3 Q. Why not?  
4 A. I just -- people who are at the DVR, I  
5 tell them how long it lasts, that's it.  
6 Q. Who would you tell how long it lasts?  
7 A. Anybody at the time that's at the DVR, if  
8 they're wondering, if they ask me, I let them  
9 know.  
10 Q. So if correctional facility personnel  
11 wanted to review video on August 24th, 2012, would  
12 they have needed to come to you for assistance?  
13 A. Nope, not at all.  
14 Q. Why not?  
15 A. They know how to run it. They know how  
16 to download video.  
17 Q. How do they know?  
18 A. I taught them in the very beginning, and  
19 from there it's fairly straightforward.  
20 Q. So you're telling me that you taught  
21 personnel how to download video, but you never  
22 told them that the video footage would be lost if  
23 they didn't download it within 15 days?

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1 MR. FREDERICKS: Objection to form. You  
2 can answer.  
3 A. Just people -- people that are in the  
4 video room at the time, if they're wondering, you  
5 know, I tell them -- I show them how to use it. I  
6 said you've got somewhere around 15 days. Who  
7 they tell after that, I have no idea.  
8 Q. Back on August 24th, 2012, was that  
9 reduced to writing in any Northern New Hampshire  
10 Correctional Facility document that video footage  
11 would be lost if it weren't downloaded within 15  
12 days?  
13 MR. FREDERICKS: Objection.  
14 A. I don't know if they wrote it down  
15 anywhere. I have no idea. Nothing that I wrote.  
16 Q. As of August 24th, 2012, who besides you  
17 associated with the Northern New Hampshire  
18 Correctional Facility would have known that video  
19 footage would be lost if it were not downloaded  
20 within 15 days?  
21 MR. FREDERICKS: Objection to form.  
22 A. I don't know how many people would know.  
23 I'm sure by word of mouth.

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1 Q. Back on August 24th, 2012, what types of  
2 employees associated with the Northern New  
3 Hampshire Correctional Facility had the training  
4 on how to download video?  
5 A. That, I would not know. They do their  
6 own thing. Who they show, who they train, I have  
7 no idea. I just maintain it.  
8 Q. All right. Who administered such  
9 training back on August 24th, 2012?  
10 MR. FREDERICKS: Objection to form.  
11 A. I'm not sure who would have done it.  
12 Q. Had you ever trained anyone on how to  
13 download video here?  
14 A. Just when I installed it, I showed them  
15 how to use it, and then they probably showed other  
16 people. But that's all I do.  
17 Q. When did you install it?  
18 A. That was installed in I want to say '08  
19 or '09, somewhere around there.  
20 Q. All right. Do you remember ever telling  
21 Jeffrey Smith on August 24th, 2012, or any time --  
22 strike that.  
23 Do you remember telling Sergeant Smith at

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1 any time before September 10th, 2012, that video  
2 footage had to be downloaded within 15 days?  
3 A. I don't recall. Don't remember.  
4 Q. Have you ever had any communications with  
5 an investigator by the name of Timothy Coulombe  
6 with regard to preservation of video evidence?  
7 A. He would have been one of the ones I  
8 would have trained.  
9 Q. So would you have told Investigator  
10 Coulombe that if the video footage weren't  
11 downloaded within 15 days, it would be lost?  
12 A. I don't know if I told him directly.  
13 It's too long ago for me.  
14 Q. When would you have trained him?  
15 A. When it was installed back in '08, '09.  
16 Q. All right. Have you ever participated  
17 in any communications with a Detective Michael  
18 Cote with regards to the preservation of video  
19 evidence?  
20 A. No.  
21 Q. You told me a few moments ago that Tim  
22 Coulombe would have been one of the persons whom  
23 you trained on the video, right?

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1 **A. Um-hum.**  
 2 **Q. Yes?**  
 3 **A. Yeah.**  
 4 **MR. FREDERICKS:** You have to answer.  
 5 **A. It would be, right.**  
 6 **Q.** Do you recall whether you trained Jeffrey  
 7 Smith?  
 8 **A. No, I didn't.**  
 9 **Q.** Do you know who trained Jeffrey Smith?  
 10 **A. No idea.**  
 11 **Q.** Has there ever been an instance that you  
 12 can recall in your capacity as the electronics  
 13 technician here where some personnel associated  
 14 with the Northern New Hampshire Correctional  
 15 Facility has instructed you to preserve video  
 16 evidence?  
 17 **A. I'm not in charge of that. I never**  
 18 **download anything.**  
 19 **Q.** All right. Would Scott Lambertson have  
 20 been one of the persons whom you trained on the  
 21 video?  
 22 **A. I don't recall training him, no.**  
 23 **Q.** Okay. Have you had any -- did you have

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1 any communications at any time with Scott  
 2 Lambertson when he was the chief security officer  
 3 here with regard to the preservation of video  
 4 evidence?  
 5 **A. I couldn't recall. I don't remember.**  
 6 **MR. KING:** Okay. Thank you. I don't  
 7 have anything further.  
 8 **THE WITNESS:** Okay.  
 9 **MR. FREDERICKS:** Okay. We're all set.  
 10 (Deposition concluded at 11:30 a.m.)  
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1 **CERTIFICATE OF WITNESS**  
 2  
 3 I, Yvon Poulin, have read the foregoing  
 4 transcript of deposition taken on Wednesday,  
 5 September 20, 2017, at the Northern NH  
 6 Correctional Facility, Berlin, New Hampshire, and  
 7 do hereby swear/affirm it is an accurate and  
 8 complete record of my testimony given under oath  
 9 in the matter of Leite v. Goulet, et al.,  
 10 including any and all corrections that may appear  
 11 on those pages denoted as "Corrections."  
 12  
 13 \_\_\_\_\_  
 14 Yvon Poulin  
 15 STATE OF \_\_\_\_\_  
 16 COUNTY OF \_\_\_\_\_  
 17  
 18 Subscribed and sworn to before me this \_\_\_\_\_ day  
 19 of \_\_\_\_\_, 2017.  
 20  
 21 \_\_\_\_\_  
 22 Notary Public \_\_\_\_\_ J.P. \_\_\_\_\_  
 23 My Commission Expires: \_\_\_\_\_

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1 **CORRECTION AND SIGNATURE PAGE**  
 2 **DEPOSITION:** Yvon Poulin  
 3 **DATE OF DEPOSITION:** September 20, 2017  
 4 **PAGE LINE**      **NOW READS**      **SHOULD READ**  
 5 \_\_\_\_\_  
 6 \_\_\_\_\_  
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 20 Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2017.  
 21  
 22 \_\_\_\_\_  
 23 Yvon Poulin

1 C E R T I F I C A T E

2 I, Celeste A. Quimby, a Licensed Court  
3 Reporter of the State of New Hampshire, do hereby  
4 certify that the foregoing is a true and accurate  
5 transcript of my stenographic notes of the  
6 deposition of Yvon Poulin, who was first duly  
7 sworn, taken at the place and on the date  
8 hereinbefore set forth.

9 I further certify that I am neither attorney  
10 nor counsel for, nor related to or employed by any  
11 of the parties to the action in which this  
12 deposition was taken, and further that I am not a  
13 relative or employee of any attorney or counsel  
14 employed in this case, nor am I financially  
15 interested in this action.

16 THE FOREGOING CERTIFICATION OF THIS TRANSCRIPT  
17 DOES NOT APPLY TO ANY REPRODUCTION OF THE SAME BY  
18 ANY MEANS UNLESS UNDER THE DIRECT CONTROL AND/OR  
19 DIRECTION OF THE CERTIFYING REPORTER.

20

21

22

23 CELESTE A. QUIMBY, LCR No. 17

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